

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Atreyu Jesse Thompson

Debtor 1

Amber Nicole Thompson

Debtor 2

Freedom Mortgage Corporation

Movant(s)

v.

Atreyu Jesse Thompson

Amber Nicole Thompson

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:18-BK-04825-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 50

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Atreyu Jesse Thompson and Amber Nicole Thompson, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted

3. Admitted.

4. Admitted in part, denied in part. It is admitted that Debtor(s) have failed to tender monthly payments in a manner consistent with the terms of the Mortgage and Note. Debtor(s) are without sufficient knowledge as to Movant's wish to institute foreclosure proceedings; therefore, it is denied.

5. Admitted. On or about September 20, 2021, Debtor(s) made a payment in the amount of approximately \$2,800.00 to bring their account current.

6. Admitted.

7. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 7; therefore, it is denied. Strict proof is demanded

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Paragraph 10 contains a conclusion of law to which no response is required
11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: September 20, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, September 20, 2021, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Mario Hanyon, Esquire
BROCK & SCOTT, PLLC
302 Fellowship Road, Suite 130
Mount Laurel, NJ 08054
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

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Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire